

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROGER E. HUGHES, JR., as Settlement Agent,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 04cv11635-NG
)	
MICHAEL G. & KENDRA B. GEORGES,)	
Individually and as Trustees of the)	
Georges Realty Trust,)	
KARA GEORGES HUNTINGTON,)	
ERIK M. GEORGES,)	
UNITED STATES OF AMERICA, and)	
LYNNE F. RILEY, as Chapter 7 Trustee of)	
the Bankruptcy Estate of Michael G. Georges,)	
)	
Defendants.)	
_____)	
)	
UNITED STATES OF AMERICA)	
)	
Cross-claimant,)	
)	
v.)	
)	
MICHAEL G. GEORGES)	
)	
Cross-claim Defendant.)	
_____)	

JOINT MOTION FOR ENTRY OF STIPULATED JUDGMENT

The United States of America, Plaintiff Roger E. Hughes as Settlement Agent, and defendant and cross-claim defendant Michael G. Georges (who has waived service of the Complaint for Interpleader and of the United States of America's cross-claim, pursuant to Fed.R.Civ.P. 4(d)), by and through their undersigned counsel, hereby submit the attached

stipulated judgment, and move this court to enter such judgment in the above-captioned case.¹

The attached stipulated judgment would declare the Complaint in Interpleader moot, as the interpleaded funds have been paid to the United States of America in accordance with a Judgment entered in bankruptcy adversary proceeding number 02-1352-JBR (Bankr. D. Mass.), and pursuant to stipulation of Roger Hughes as Settlement Agent, the United States of America, Michael G. Georges, Kara Georges Huntington, and Erik M. Georges, filed in the bankruptcy case. The attached stipulated judgment also provides for the entry of judgment in favor of the United States of America and against Michael G. Georges for Michael G. Georges's outstanding assessed federal income tax liabilities for tax years 1993, 1994, and 1997, in the amount of \$24,635.42, as of June 14, 2004, minus any amount paid to the United States of America in partial payment of the 1993 liability (after application of the interpleaded funds mostly to prior years) in accordance with the parties' stipulation and the Judgment in bankruptcy adversary proceeding 02-1352-JBR (D. Mass.), plus interest and other additional amounts that may have accrued after June 14, 2004, and that continue to accrue as provided by law.

¹The United States of America, Plaintiff Roger E. Hughes as Settlement Agent, and defendant and cross-claim defendant Michael G. Georges, through their undersigned counsel, agree that this motion shall be filed electronically by counsel for the United States of America, Barry E. Reiferson, and that the signature of each signatory to this motion shall appear in the form required by the Court's Electronic Case Filing Administrative Procedures (/s/ _____). A copy of one signature page hand-signed by counsel for Michael G. Georges and a copy of one signature page hand-signed by Plaintiff Roger E. Hughes as Settlement Agent, pro se, shall be attached to the electronically filed motion as Exhibit 1.

Wherefore, the United States of America, Roger E. Hughes as Settlement Agent, and Michael G. Georges, pray that this court enter the attached stipulated judgment, and order this case closed.

/s/ Ann Brennan

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/s/ Barry E. Reiferson

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/s/ Roger E. Hughes, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon each of the parties, by mail, on January 18, 2005.

/s/ Barry E. Reiferson

Barry E. Reiferson